

EHS SAFETY POLICY

Subject: Confined Space Policy	Doc ID: #34466	Page 1 of 21
Effective: 12-14-23	Document Owner: Safety Manager	Approved By:

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I. POLICY

It is the policy of the Quinnesec Mill that, as a condition of employment, all individuals involved in entering a confined space, for any reason, shall comply with the Confined Space Entry Procedures. These procedures will be applied throughout the mill by all affected members, contractors, and departments.

II. INTENT/PURPOSE

The purpose of the Confined Space Entry Policy is to protect individuals from the hazards associated with entering and working in confined spaces included but not limited to dangerous atmospheres, mechanical/electrical equipment, or limited means of escape. The uniform procedures are intended to provide consistency and meet the requirements of all appropriate regulatory agencies.

III. DEFINITIONS

Acceptable Atmospheric Conditions - exist in a confined space where uncontrolled hazardous atmospheres are not present. This means all atmospheric testing indicates a safe atmosphere.

Authorizing Individual - is the member responsible for evaluating the hazard potentials, determining the type of entry required, and initiating the permit. This is typically a member of the operating department.

Blank or Blind - Means of absolute closure of a pipe, line or duct with a solid plate or cap that completely covers the bore and is capable of withstanding maximum upstream pressure.

Confined Space - Any space which meets all of the following criteria: 1) Is large enough and so configured that a human can bodily enter and perform assigned work; and 2) Has limited or restricted means for entry or exit; and 3) Is not designed for continuous human occupancy.

Debrief – A conversation with a department responsible member (such as OMC, authorizing individual or standby) during and after the entry regarding the conditions within the confined space.

Double Block and Bleed - A means of closure of lines, ducts, or pipes by two locked closed valves with a locked open valve between them that is vented to drain or to the atmosphere.

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Engulfment - The surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be aspirated to cause death by filling or plugging the respiratory system, or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.

Entry - means the action by which a person passes through an opening into a permit-required confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space.

Entrant(s) – Individual(s) who bodily enter the confined space.

Entry Supervisor - MIOSHA terminology for responsibilities associated with managing a confined space entry. At the Quinnesec Mill, the entry supervisor responsibilities are fulfilled by either the authorizing individual, or the standby during an entry operation. The term Entry Supervisor is not used within this Confined Space Policy.

Emergency Response Team - Appropriately trained teams providing initial response to emergencies in fire, medical, hazardous materials and rescue. Plant Protection coordinates the initial response and are integral members of these response teams.

Hazardous Materials – Any substance or mixture of substances having properties capable of producing hazardous effects on the health or safety of a human. Typical hazardous materials include: toxic materials (Cl₂, ClO₂ gas, biocide) corrosive liquids (acid, caustic, white and black liquor, peroxide) flammable materials (DVG, CVG, methanol, foul methanol) and steam. This list is not all inclusive.

IDLH - Immediately Dangerous to Life or Health means any condition which poses an immediate ~~or delayed threat~~ of loss of life; may result in irreversible immediate/severe health effects, eye damage, irritation, or other conditions which could impair escape from the permit space.

Health and Safety – Mill department with responsibility for safety, medical, emergency response, fire protection and Plant Protection.

Lower Explosive Limit (LEL) - This is defined as the lowest concentration of gas or vapor (% by volume in air) that burns or explodes if an ignition source is present.

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Master List - A complete list of the mill's confined spaces. Data in the master list must include space name/equipment number, hazards, preparation, type of rescue, emergency information, and special considerations.

Non-Permit Confined Space - This space meets the three basic criteria of a confined space, but does not contain, or with respect to atmospheric hazards have the potential to contain, any hazard capable of causing death or serious physical harm. This determination is based on a detailed documentation evaluation including both operation's management and Loss Prevention representatives. * Reference Appendix A

Permissible Exposure Limit (PEL) - This is the allowable average airborne exposure in any 8-hour work shift of 40-hour workweek, which shall not be exceeded. This value is adjusted if work shift is longer than 8 hours.

Permit-Required Confined Space – A confined space which after evaluation has actual or the potential to contain a hazardous atmosphere, engulfment hazards, inwardly converging walls or floors which taper to a smaller cross-section, or any other recognized serious safety or health hazard

Plant Protection - An independent service provider performing duties such as safety, security, fire protection, medical services, rescue, and other duties as contractually agreed upon.

Standby (Attendant) - The individual stationed outside one or more confined spaces, who is responsible for monitoring and maintaining communication with the entrants, overseeing the entry operations, terminating the entry when necessary and alerting the Emergency Response Team, if required.

Vertical Entry - Any entry into a confined space where rescue would require lifting someone vertically 5 feet or more.

IV. PROCEDURES/PRACTICES

A. Application

1. Spaces which appear confined, but do not have a limited means of entry/exit are not MiOSHA defined confined spaces.

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(NOTE: A standard doorway and/or industrial stairs are not considered limited means of entry/exit – vertical ladders and step ladders are not considered an industrial stair for purposes of this policy).

This does not eliminate our responsibility to properly address safety hazards associated with those spaces before working in, on, or around them. Examples of these spaces include.

- a. Thickeners/Pump Pits at WWTP
- b. Washer Drums in Pulp Mill when fiberglass top removed and industrial stairway inserted.
- c. Certain pits in PS&D which have industrial stairs/steps in place.
- d. Pump Pit under 40 Machine Cutter Deck.
- e. 40 Mach w/e Pulper Motor Pit

B. Confined Space Entry Permit

1. All entries into confined spaces at the Quinnesec Mill require use of the confined space entry permit, unless otherwise approved by Health and Safety and a management representative of the operating department. Deviation from procedures contained herein can only be considered if actual or potential safety and health hazards can be eliminated from the confined space.
 - a. See Appendix A for examples of confined space exceptions.
2. All equipment to be used during the entry and for rescue purposes must be readily available (not necessarily at each entry), properly inspected and be in operable condition before entry is made.
3. Prior to entry, a pre-entry briefing shall be conducted for the standby, and any individuals entering the space. The pre-entry briefing should cover all permit conditions, signs, symptoms, consequences of exposure to the potential gases, and rescue procedures. The person conducting this briefing must be familiar with the entry and the hazards associated with it.
4. The confined space shall be tested for hazards, and the permit initialed by those individuals who have responsibility for testing the atmosphere. Entrants or their designated representatives can witness the tests if desired. Testing will only be conducted after all other pre-entry preparations have been completed, and both the authorizing individual and standby have signed the front of the permit.

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5. The person giving the pre-entry briefing, and the standby, must list their names on the back of the permit.
6. Entrants' names must be recorded on the card. This can be done in one of three ways: 1) The entrant prints their name on the card, or 2) the standby enters the name, or 3) an entrant team member enters a name for a team member at the time of entry. The entrant must also be marked as "in" or "out" on the card.
7. The confined space entrants shall assure that all pre-entry considerations have been met and necessary information has been recorded on the entry permit prior to entry.
8. The entry permit shall be posted near the location of the entry.
9. The standby is responsible for assuring that any additional entrants into the confined space have received a pre-entry briefing prior to entry, and are properly identified on the card. Entrants cannot enter a confined space without receiving a pre-entry briefing.
10. The area operator or Lockout Coordinator must be notified when the confined space work is beginning.
11. The permit shall remain in effect until the task is completed or the scope of work changes, or conditions change within the space up to a maximum of 12 hours. A new permit must be completed at a shift change. **If, for any reason, the work is not started within 30 minutes of the atmospheric testing of the confined space, retesting of the atmosphere must be performed prior to entry.**
12. Quinnesec mill personnel, Quinnesec mill's primary contractors, and subcontractors may enter under the same permit if they share common work activities and meet the permit requirements.
13. When multiple contractors are working in a confined space, their activities must be coordinated by the Quinnesec mill representative(s) responsible for the work to ensure personnel safety.
14. If standby is observing more than 1 confined space and the first space must be terminated, the additional spaces must also be terminated.
15. All completed/expired permits shall be returned to the operating department where issued, and debriefing conducted. All expired permits shall be sent to Plant Protection. The expired permits must be retained for a period of (one) 1 year.

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C. Pre-Entry Considerations

1. Clean

The confined space shall be emptied of all solids and liquids as far as practical.

- a. Open drains at the lowest point.
- b. Follow mill procedures when disposing of drained liquids.
- c. As much stock, sludge, or sediment shall be pumped out as possible.
- d. The confined space shall be cleaned of residual products by washing with hot or cold water, flushing, steaming, or any other practical method.
- e. All lines, including sewer connections extending to or from the confined space will be drained, flushed, and cleaned. Remember that toxic gases can back up from a sewer drain.
- f. If visibility is restricted to 5 ft. or less by dust, the confined space must be cleaned and ventilated.

2. Hazard identification

Prior to entry, the confined space shall be evaluated for existing or potential hazards.

These hazards include, but are not limited to the following: falls, engulfment, non-respirable atmosphere, explosiveness, restrictive access, temperature and humidity extremes, radiation sources, entanglement, and material remaining in the space.

3. Isolation

All lines, including sewer connections, to or from the confined space represent a potential hazard that must be evaluated and properly isolated. Lines that carry any hazardous materials such as toxics, corrosive liquids, flammables or steam can be isolated by disconnecting or blanking the lines, or by closing two valves and draining the line segment between them. Water and other lines that do not carry

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hazardous materials or volumes of materials that present engulfment hazards can be isolated by closing a single valve.

4. Lockout

If any electrical or mechanical apparatus is installed within the confined space, its activation must be guarded against. All electrical or mechanical equipment must be locked out in accordance with the mill's Lockout Procedure.

5. Ventilation

Since gases may leak into or otherwise enter a confined space during work, or an oxygen deficiency may be created, either forced or natural ventilation must be continued as long as workers are in the confined space. Entry during natural ventilation conditions is permitted if all atmospheric tests are within acceptable limits and there is no potential for atmospheric conditions to change. All other entries shall use forced ventilation preferably with fans or blowers. Wherever practical, vapors should be exhausted from the top of the vessel. Safety precautions necessary when using mechanical ventilation include:

- a. Prevent circulation of contaminated air into the fresh air intake.
- b. Prevent contaminating other areas with concentrations of flammable or toxic materials, which have been removed from the confined space.
- c. Assure that pockets of trapped contaminants do not remain in the confined space.

D. Equipment Required

1. General practice

Lifelines and harnesses are required to be worn for all confined space entries whenever possible. An exception to the lifeline requirement may be where the lifeline itself presents an entanglement hazard with equipment or other entrants. In this case, Health and safety-or the operating department can review the situation and ~~agree~~ determine that no lifeline is required. If not attached to a harness, a lifeline must be immediately available at all times to facilitate a rescue. * Reference Appendix B for an approved list of harness exception areas. Important: Wristlets and/or anklets must be worn if harnesses are unable to be worn in a confined space.

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Wristlets and/or anklets can be used as retrieval devices where use of a harness is impractical. This means that before entering a confined space, a person needs to be wearing a harness, wristlets, or anklets. All entries require some method of retrieving the person.

Typical equipment required for confined space entry has been assembled and stored in confined space entry carts or cabinets. These carts (cabinets) are designed to provide equipment necessary for entry, not rescue. Several confined space entry carts (cabinets) are present in each operating area.

2. Additional requirements

Certain entries require additional protective equipment to protect entering personnel. This equipment should be identified by the entering team with input from the operating department and, where necessary, health and safety.

The following are common entries having additional equipment requirements:

- a. Vertical entries require a mechanical means to assist in rescue. A lifeline and harness shall be used, and the lifeline must remain attached to the harness. If an entanglement hazard exists, workers can operate wearing only the body harness. However, the lifeline must be lowered down into the confined space, so it is available if needed.
- b. IDLH entries require the use of an auxiliary air supply, harness and lifeline, and other safety equipment as hazards dictate. This entry also requires a second standby prepared for entering with duplicate safety equipment. A continuous air monitor is also required.
- c. Entries where a potential exists for hazardous gas exposure or lack of oxygen require continuous air monitoring.

E. Communications

1. The following must be provided for the standby, and noted on the permit:

- a. Means to communicate with entrants – the standby must be able to clearly communicate with entrants for both routine and emergency needs. This can be either by radio, voice, hand, visual, light or other reliable means under all entry conditions.

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b. Means to contact rescue – the standby must be provided with one of the following to contact Plant Protection in an emergency:

- Radio - Channel 1
- Cellphone (906) 779-3333
- Mill Telephone - 3333

In all cases, the location of the nearest mill telephone must be understood by the standby and marked on the permit

F. Authorizing Individual

1. The authorizing individual is responsible for ensuring that pre-entry conditions have been satisfied per the front of the confined space permit card, including a review of the existing and potential hazards.
2. Verifies that communication is available with Plant Protection for emergency response
3. Is aware of the personal protective equipment needed for entry and to assure compliance
4. Conducts an initial pre-entry briefing.
5. Signs the confined space permit card prior to atmospheric testing of the confined space.
6. Conducts post entry debriefing and signs the confined space permit card when work is completed.
7. Ensure completed card is properly turned in to when work is complete

G. Atmospheric Testing

1. Pre-entry testing

All entries require that atmospheric testing of the confined space be made immediately prior to allowing anyone to enter. These tests are to be performed by plant protection and must include:

- a. Oxygen content - Oxygen content must be measured first. O₂ content must be between 19.5% and 23.5%. Entry will not be permitted where the

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atmosphere is determined to be either oxygen deficient or oxygen enriched unless it is performed as an IDLH entry.

- b. Explosiveness or combustibility - Oxygen content must be within the proper range for valid readings. There must be no more than 10% of the Lower Explosive Limit (LEL) prior to entry. If any hot work is to be performed, a zero reading must be obtained. For combustible dusts, visibility must be maintained at greater than 5 ft.

 - c. Toxic gases - Must include testing for gases that potentially could be present. Concentrations of toxic gases or vapors must not be above the recommended permissible exposure limit (PEL). If any measurable toxic gas is found above the PEL, purge the confined space until an acceptable reading is obtained. Toxic atmospheres may occur when gases, liquids, vapors, mists, dusts, or solid materials are:
 - 1) Stored in the confined space.
 - 2) Created by work being done in the confined space.
 - 3) Created naturally in the confined space.
 - 4) Stored or created in areas adjacent to the confined space. Plant Protection maintains a reference of all potential gases for each confined space.

 - d. Sampling must be representative of the entire confined space. Use extension probes to safely sample several layers of the confined space.

 - e. After atmospheric testing has been conducted, the results shall be written on the permit. Results shall be reviewed with the entrants and standby, and if conditions are acceptable, the entry may begin.
2. Subsequent test
- At a minimum, retesting shall be conducted every shift change (8 or 12-hour shifts) while work is proceeding. Retesting will be conducted by plant protection and documented on the entry permit. Additionally, retesting is required if the confined space has been unoccupied for more than 30 minutes at any time after initial testing.

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3. Entries must be evaluated as to type of work being performed and the possibility of gases accumulating in the space to determine if continuous monitoring is required. Hot work requires continuous monitoring along with continuous ventilation.

H. Standby (Attendant)

Under no circumstances shall any individual enter a confined space without having a standby posted outside the entrance.

1. The standby shall remain stationed at the point of entry while individuals are within the confined space and have no other duties which conflict with his or her primary duties of providing observation of, and/or communication with, the individuals within the confined space. The standby can pass their duties to another individual, so long as that person is fully aware of the hazards, entry conditions and duties of the standby. The new standby must sign the permit card before beginning their duties.
2. Functions of the standby:
 - a. Maintain communication with the members in the confined space.
 - b. Handle lifelines if required.
 - c. Alert plant protection in the event of an emergency either by radio on Channel 1 (emergency channel), cell phone (906) 779-3333 or on a pre-identified mill phone by calling the emergency number 3333.
 - d. Be aware of the potential hazards, both inside and outside the confined space during entry.
 - e. Keep track of the number and identity of the individuals in the confined space.
 - f. Be aware of the personal protective equipment needed for entry and to assure compliance.
 - g. Provide a pre-entry briefing for any additional entrants. Prevent any unauthorized entrants from entry into the confined space.
 - h. Terminate the entry when conditions warrant and indicate on the permit card when this occurs.

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- i. Initiate non-entry rescues with lifelines, harnesses, and retrieval devices (tripods).
3. The standby must never enter into a confined space for rescue. The Emergency Response Team will perform the rescue. The standby must continue to support the entry.
4. The number of standby personnel for safe confined space entry shall be contingent upon the number of entry points, levels in the confined space, or type of entry. When it becomes difficult for one person to keep track of all activities within a confined space, additional standby personnel shall be provided.

I. Entry and Entrant Requirements

1. General practice

When all pre-entry considerations, equipment requirements, standby requirements, pre-entry briefing, and atmospheric testing have been completed, the space can be considered safe for entry.

2. Requirements of Entrant(s)

- a. Follow all other safety policies and expectations (i.e. placing locks on appropriate lock box, wear proper PPE, elevated work, etc.)
- b. Listen to/receive pre-entry briefing prior to entry
- c. Ensure confined space permit is completed properly before entry
- d. Ensure name has been legibly entered on permit and check in and out
- e. Monitor air conditions if doing hot work or introducing new hazards
- f. Participate in providing entry comments for debriefing

3. General guidelines

- a. All safe-working practices that are required outside of a confined space must be followed inside a confined space including barriers and warning signs if required. (i.e., fall protection, trip hazards, guardrails, etc.)

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- b. All electrically powered tools or equipment used in a confined space where electrical shock hazards exist (i.e. steel tanks or wet conditions, etc.) must be either a low voltage type or be powered through a Ground Fault Circuit Interrupter (GFCI).
 - c. Lifelines and harnesses are required to be worn for all confined space entries. The only exception to this requirement is if an entanglement hazard exists with equipment or other entrants and Health and safety or operations have approved this. In this case, the harness must still be worn, and the lifeline must be immediately available at all times to facilitate a rescue. *
Reference Appendix B for an approved list of harness exception areas
 - d. All other mill personal protection policies will remain in effect.
4. Special considerations

Work is often required to be performed in a confined space with special entry conditions. All general entry requirements apply. Additional requirements may be necessary, as outlined below:

- a. Hot work
 - 1) Any hot work requires assurance that fire hazards and combustible atmospheres are controlled.
 - 2) The atmosphere must be continuously monitored for combustibles and maintained at 0% of the Lower Explosive Limit (LEL).
 - 3) Hot work permits are required prior to entry.
 - 4) When performing hot work, a local exhaust blower or general mechanical ventilation must be used in conjunction with proper respiratory protection.
 - 5) Compressed gas cylinders are not allowed in a confined space. Gas lines should be protected from rupture or damage and shall be removed from the confined space when left unattended.

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- 6) Sources of compressed gases or arc welding power should be turned off immediately when an emergency arises or when work is interrupted or completed.

- b. Use of hazardous and/or flammable material in confined space. Work in confined spaces frequently requires the use of hazardous materials or flammable materials. This includes, but is not limited to, coatings, lining, paints, cements, or solvents.
 - 1) Quantities of hazardous material or flammable materials brought into the confined space shall be limited to the smallest amount consistent with efficient use.
 - 2) Container should be designed to minimize evaporation or spillage. Safety cans or small squeeze bottles are recommended.
 - 3) Use of forced ventilation must occur when using a hazardous material or flammable product in a confined space (see Ventilation of Confined Space - Page 7).
 - 4) The confined space must be continuously monitored for combustibles and toxic gases. At no time shall the combustible vapor concentration be above 10% of the lower explosive limit. Toxic gas monitoring shall determine the level of respiratory protection needed to work safely in the confined space.
 - 5) When using flammable materials, all sources of ignition shall be eliminated.
 - 6) All manufacturer recommendations and instructions must be strictly followed.
 - 7) Use non-sparking tools when required.

J. Emergency Response

The mill medical, fire emergency response, and rescue teams (mill emergency response teams) will be responsible to respond and assist with evacuation and rescue when the emergency system is activated. An emergency response request should be made either via radio on Channel 1 or by phoning extension 3333.

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1. The emergency response request shall include the following:
 - a. Location and type of emergency.
 - b. Injuries (if any).
 - c. Present conditions.
 - d. Nearest emergency access point.
 - e. Number of people involved.

Assure that the emergency response team has all the information prior to ending the conversation. Let them end the conversation.

2. Appropriate emergency response teams have been trained in procedures to handle various conditions that may exist during a rescue. Emergency entry procedures are outlined in the Mill Emergency Response Plan maintained by Health and safety.

K. Post Entry Considerations

1. When all work inside the confined space has been completed, the individuals entering the confined space shall:
 - a. Verify all entry team members are no longer in the confined space.
 - b. Notify the control room operator of completed task.
 - c. Report any hazards created or confronted during the entry to the authorizing individual.
 - d. Return all permits to the operating department.

2. The operating department shall:
 - a. Complete and cancel the confined space permit including debriefing. The debriefing shall cover the effectiveness of the confined space procedure and any hazards confronted or created during entry.

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- b. Determine that all equipment used during the entry has been removed from the confined space.
- c. Proceed with reconnecting lines, replacing covers and hatchways, removing safety locks, and restoring power.
- d. Return the continuous monitor, completed confined space entry permit, and the confined space cart to their appropriate location.

L. Training

- 1. Employees assigned as entrants, standbys, atmospheric testers, entry supervisors, and rescuers shall be trained before being assigned duties when there is a change in or deviation from the program and before there is a change in assigned duties. Absent of any changes to the program, refresher training shall be conducted at least annually.
- 2. Employees transferred to another department must receive training on specific procedures prior to beginning work in permit spaces.
- 3. Training shall include the specific requirements of those procedures, identify health and safety hazards of the specific spaces, and the duties/responsibilities of each person assigned during permit space entry.
- 4. All training documentation (dates, signatures, content, etc.) must be maintained on file at Health and safety for the current year plus two previous years.

V. RESPONSIBILITIES

A. Health and safety

- 1. Responsible for initial employee training. Maintain training documentation.
- 2. Responsible for Plant Protection training and all ER team training.
- 3. Responsible for training contractors on the Confined Space Policy.

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4. Responsible for maintaining a written program including inventory of confined spaces and assessment of the program.

5. Responsible for performing an annual review using cancelled permits and notes.

B. Members

1. All members have the responsibility to fulfill the intent and purpose of this Confined Space Policy. This includes both personal behavior and being an active advocate of the policy with all others in the mill.

2. Each member shall annually be instructed on provisions and requirements of this Confined Space Policy. This is the responsibility of each team.

3. Each member shall effectively enforce compliance of this confined space procedure. Team involvement is important.

4. The confined space authorizing individual is the member that initiates the confined space permit. That individual is responsible for evaluating the hazard potentials and determining the type of entry required.

5. Members hosting a visitor or contractor who needs to enter a confined space are responsible to make sure the visitor or contractor has been trained in Quinnesec mill's Confined Space Entry Policy.

C. Operating Department

1. Health and safety and operating departments are jointly responsible for identifying and labeling confined spaces. When a confined space is identified, but entry is not allowed under normal circumstances, appropriate means shall be taken to prevent unauthorized entry. The label should state: Danger - confined space permit required. DO NOT ENTER or a similar sign.

2. Develop and maintain a department inventory of confined spaces including vessel name, hazards, preparation required, and type of rescue.

3. Conduct post entry of debriefing and sign the expired/completed card.

4. Conduct periodic audits of actual permit space entries.

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- 5. Submit completed permits to Health and safety for review and filing.

- D. Contractors
 - 1. Contractors have the responsibility to fulfill the intent and purpose of the Confined Space Policy.
 - 2. Ensure that all workers participating in confined space entry are trained annually for the duties they perform.
 - 3. Perform post entry debriefing with an authorized Quinnesec mill person and return the completed card to the operating department.

- E. All
 - 1. The health and safety department and a management representative from the operating department shall approve any deviations from the procedures outlined in this policy. Examples include: non-permit confined space and alternative entry procedures.
 - 2. Ensure that roles and responsibilities (i.e. authorizing individual, standby, entrant, etc.) are carried out according to this policy

APPENDIX A

Deviations from the confined space policy require the approval of both the operating and safety departments and include Non-Permit Confined Spaces and spaces with exceptions to harness use requirements.

IMPORTANT: Lockout is still fully required for all confined spaces regardless of their status.

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A. Non-Permit Confined Spaces

A non-permit confined space is one which meets all three criteria of a confined space but poses no actual or potential atmospheric hazards and all hazards within the space are eliminated without entry into the space.

1. Confined spaces classified as ‘Non-Permit’ will have a red, non-permit sticker applied to the confined space permit. This sticker requires the initials of an operating department representative and a safety department representative. A space is not considered non-permit until that sticker has been applied to that Permit.
 2. Once classified ‘Non-Permit’, a stand-by (attendant), sign-in/sign-out, harness / tie-off, routine air monitoring by Plant Protection (monitor after space vacant for 30 mins or more) is no longer required.
 3. Non-Permit confined spaces continue to require:
 - a. Continuous air monitoring must happen **if** hot work is taking place.
 - b. The space is configured such that air contaminants could collect or build-up.
 - A fire watch is required for all hot work when required in a confined space.
 4. **IMPORTANT:** Depending on the space, ‘non-permit’ rules may not be in effect until after certain steps are complete (clean up, sandblasting, installation of scaffolding, etc.)
2. Examples of non-permit confined spaces at the mill:
- a. Suction roll removed from machine, header removed from one end, blocked to prevent rolling movement.
 - b. Cooling towers (R&U)
 - c. Woodyard Blade Screen
- R&U agreed upon areas**
- d. Penthouse – 10th Floor,
 - e. Vestibule,
 - f. Lower Furnace,
 - g. Upper Furnace,

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h. Economizer Sections

B. Harness exceptions

1. Harness and lifelines are required for confined space entry. The MiOSHA Standard and our mill confined space entry policy allow for an exception to the tie-off portion when entanglement hazards exist (see Section G (3) (c) in policy).
2. In confined spaces that have very tight passes inside with equipment or structural based items that can entangle the harness (bolts, rods, etc.), the operating department can review them with the safety department and determine if the use of a harness is required or not.
3. **IMPORTANT NOTE:** Entanglement hazards do not apply in situations where a fall hazard exists. Tie-off with harness, lanyard, and properly rated anchor point is required or some other acceptable means to address the fall hazard must be in place.
4. Approved confined spaces where harnesses are not required but wrist and anklets must be worn:
 - a. Steam drum and mud drum on Recovery Boiler (RB), Waste Fuel Boiler (WFB), and Package Boiler (PB)
 - b. IK Passes (after scaffolding in place) (RB & WFB)
 - c. 4th fl. Precipitator access (RB)
 - d. 5th fl. Precipitator access (after scaffolding in place) (RB)
 - e. 3 ½ fl. Precipitator access on catwalks (WFB)
 - f. Precip penthouse and top of wires and plates (RB & WFB)
 - g. Liquor system saltcake mix tank (RB)
 - h. Tubular heater (after scaffolding is in place) (WFB)
 - i. Deaerator (R&U)
 - j. Digester (PM): **ONLY** during digester overlay process
5. Approved confined space where harness is not required:
 - a. Dryer Cans (41 Machine)
 - Note: in the case of Q41 dryer can entries, wristlets and anklets are not required due to being physically unable to pull someone out of a dryer can. The 41-lockout room has a foldable board to be used in case of emergency.

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